

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

|                                   |   |                                |
|-----------------------------------|---|--------------------------------|
| MACNEIL AUTOMOTIVE PRODUCTS       | ) |                                |
| LIMITED, an Illinois Corporation, | ) |                                |
|                                   | ) |                                |
| Plaintiff,                        | ) | No. 08 C 139                   |
|                                   | ) |                                |
| v.                                | ) |                                |
|                                   | ) | Honorable Joan B. Gottschall   |
| CANNON AUTOMOTIVE LIMITED, f/k/a  | ) |                                |
| CANNON RUBBER LIMITED,            | ) | Magistrate Judge Arlander Keys |
| AUTOMOTIVE DIVISION,              | ) |                                |
| a United Kingdom Company,         | ) |                                |
|                                   | ) |                                |
| Defendant.                        | ) |                                |

**NOTICE OF MOTION**

**TO:** Robert S. Grabemann  
Timothy M. Schaum  
Daspin & Aument  
227 West Monroe Street  
Suite 3500  
Chicago, IL 60601  
(312) 258-1600  
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PLEASE TAKE NOTICE that on Thursday, February 21, 2008 at 9:30 a.m. or as soon thereafter as counsel may be heard, the undersigned shall appear before the Honorable Joan B. Gottschall, or whomever may be sitting her stead, in Courtroom 2325, of the Dirksen Federal Building, 219 S. Dearborn Street, Chicago, Illinois, and then and there present the attached **Defendant's Agreed Motion For Enlargement Of Time to File Its Response to Plaintiff's Motion to Enjoin Defendant From Pursuing a Collateral Proceeding in a Foreign Jurisdiction and Its Motion to Dismiss or Stay the Proceedings.**

Respectfully submitted,

CANNON AUTOMOTIVE LIMITED

By: /s/ Terrence J. Sheahan  
One Of Its Attorneys

William N. Howard  
John T. Shapiro  
Terrence J. Sheahan  
Freeborn & Peters LLP  
311 South Wacker Drive, Suite 3000  
Chicago, Illinois 60606  
(312) 360-6000

Dated: February 13, 2008

**CERTIFICATE OF SERVICE**

The undersigned, being one of the attorneys of record in the above cause, certifies that he this day caused a copy of **Defendant's Agreed Motion For Enlargement Of Time to File Its Response to Plaintiff's Motion to Enjoin Defendant From Pursuing a Collateral Proceeding in a Foreign Jurisdiction and Its Motion to Dismiss or Stay the Proceedings** to be served upon the attorneys listed below via the Northern District of Illinois, Eastern Division, ECF filing system, and as otherwise noted, prior to 5:00 p.m. on this 13<sup>th</sup> day of February, 2008.

**TO:** Robert S. Grabemann  
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/s/ Terrence J. Sheahan

Terrence J. Sheahan